



PENNZOIL PLACE • P. O. BOX 2967 • HOUSTON, TEXAS 77252-2967 • (713) 546-8886

*lev*  
*Vernon Solid waste*  
*P/k*

ANTHONY B. CAVENDER  
Attorney

August 1, 1984

Mr. David Storm  
State of California  
Hazardous Waste Division  
714/744 P Street  
Sacramento, California 95814

Re: Waste Classification Form  
Pennzoil Products Company  
of Vernon, California

Dear Mr. Storm:

On behalf of Pennzoil Products Company of Vernon, California, the above-referenced waste classification form is submitted for your review.

You will recall that Ms. Usha Mehra of Pennzoil Company's Environmental Safety and Health Division informed you that insignificant traces of hazardous constituents were found in samples of the solid waste generated by our Vernon, California, facility.

The completed waste classification form and its attachments provide a description of the analytical tests performed on this waste and the concentrations in which these hazardous constituents were found. The tests were conducted by Smith-Emery Company of Los Angeles, California, on April 19, 1984, and May 31, 1984. In accordance with the guidelines followed by your agency, the wastes generated by the Vernon, California, facility of Pennzoil Products Company are not considered regulated hazardous wastes.

In view of the urgent necessity to arrange for the safe and expeditious disposal of solid waste which has accumulated at our Vernon facility, our plant manager, Mr. James Waldrip, has not signed the form's certification at page 6. However, this form has been prepared with the advice and counsel of Mr. Waldrip, and we shall obtain his signed certification for your records as soon as possible. In his absence, and with his consent, Ms. Usha Mehra has signed this certification.

PQS2 02106



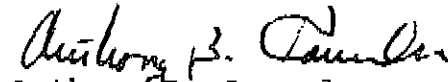
Mr. David Storm

-2-

August 1, 1984

As Ms. Mehra advised you, we would appreciate a prompt response to this notification, whether by telephone or letter. Thank you for your assistance.

Very truly yours,

  
Anthony B. Cavender

ABC:jb

Enclosures

cc: Ms. Usha Mehra  
Mr. James Waldrip

PQS2 02107

WASTE CLASSIFICATION FORM

1. Name and Address of Waste Facility.

a. Mailing address.

Pennzoil Products Company  
3430 East 26th St. - Vernon, CA 90023

b. Location at which waste is generated, if different from above.

Same as (a)

c. Contact person and phone number.

James Waldrip  
(213)385-0311

2. Description of Waste:

a. Physical description.

Clarifier Waste - liquid slurry

Grease Pit Waste - slurry

b. Quantities produced per unit time.

Clarifier Waste approximately 3500 gallons/3 months

Grease Pit Waste approximately 3500 gallons/4 months

c. Process used to generate waste.

See Attachment #1

d. Present method of waste disposal.

Land disposal (offsite)

3. Sampling Information:

a. Name and address of company that sampled the waste.

Same as 1(a)

(rev: FO3 9/83)

- b. Name of person(s) who sampled the waste.

Mr. Henry Lebseme

- c. Dates and locations of collected samples:

TYPE OF SAMPLE COLLECTED	LOCATION	DATE COLLECTED	FIELD SAMPLE NO.
Composite of several grab samples	Clarifier	4/19 - 5/31	Clarifier sample
Composite of several grab samples	Grease pit	4/19 - 5/31	Grease Pit Sample

- d. Description of sampling methodology:

- (1) Sampling technique at site or facility.

A representative sample of waste was obtained by stirring the pit waste, grabbing approximately 5 samples from the pit, and obtaining a sample from mixing the individual grabs in a 5 gallon plastic container. Sampling for clarifier pit and grease pit were done in a similar manner.

- (2) Sample handling and preservation prior to laboratory analysis.

The samples were immediately taken to the laboratories for analyses, therefore no sample preservation was done at site.

4. Testing Laboratories Information: See Attachment #2

a. Name and address of laboratories:

Smith-Emery Company  
781 East Washington Blvd.  
Los Angeles, CA 90021

b. Test methods and references: See Attachment #2

SPECIFIC TEST	METHOD*	REFERENCE
1. Organic Analysis		
- Chlorinated Pesticides		
- Polychlorinated Biphenyls		
- Chlorophenoxy Acid Pesticides		
- Nitroaromatics		
- Organophosphorus Pesticides		
- Phenols		
- Polynuclear Aromatic Hydrocarbons		
- Priority Pollutants		
- Volatile Organics		
- Carbamates		
- Other (specify)		
2. Inorganic Analysis, Metallic		
- Antimony		
- Arsenic		
- Barium		
- Beryllium		
- Cadmium		
- Chromium (VI)		
- Chromium (total)		
- Cobalt		

SPECIFIC TEST	METHOD*	REFERENCE
Inorganic Analysis, Metallic (continued)		
- Copper		
- Lead, inorganic		
- Lead, organic		
- Mercury		
- Molybdenum		
- Nickel		
- Selenium		
- Silver		
- Thallium		
- Vanadium		
- Zinc		
- Other (Specify)		
3. Inorganic Analysis, Non-Metallic		
- Total cyanide		
- Cyanide (chlorination)		
- Fluoride		
- Sulfide		
- Asbestos		
- pH		
- Free liquids		
- Other (specify)		
4. Special Tests		
- California Waste Extraction Test	Sec. 66700	
- Tests for Hazardous Properties		
- Aquatic 96 hr LC <sub>50</sub>		
- Flashpoint		
- Corrosivity		
- Head Space	Sec. 66696(a)(10)	
- Other (specify)		

\* If this is not a standard method (APHA-AWWA-WPCF, ASTM, AOAC, EPA, etc) please attach a copy of method with this report.



5. Quality Assurance and Control: (See Appendix 1) N/A
- a. On file with the DOHS Hazardous Materials Laboratory;  
yes \_\_\_\_\_ no \_\_\_\_\_
- b. Enclosed; yes \_\_\_\_\_ no \_\_\_\_\_;
- c. Will be forwarded to DOHS by \_\_\_\_\_;
6. Laboratory Results See the attached reports. (See Attachment #2)
- a. Waste Components and California Waste Extraction Test Summary (Form 1).
- b. Aquatic Bioassay. Use California Department of Fish Bioassay Data Sheet.
- c. Submission of Data and Reports (See Appendix 1).
7. Acute toxicity calculations from published data: (Form 2)
8. Corrosivity, Flammability, Reactivity (Form 3)
9. References (Attach complete citations)
10. Certification by person(s) who is the responsible manager of the facility.

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this notification and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Signature Usha Mehra

Date July 31, 1984

Printed Name Usha Mehra

Title Environmental Advisor - Pennzoil Company



## Attachment #1

### 2.C Process Used to Generate Waste

#### Clarifier Waste

The clarifier waste is generated from a drum cooperage operation at Pennzoil's Vernon plant. The cooperage operation includes a drum washing step which generates a liquid waste stream. This waste is stored in a clarifier tank where the solids from the washings settle down in the tank and the supernatant is discharged to the city's waste water treatment plant. With time, the bottom sludge builds up and is disposed offsite as clarifier waste.

#### Grease Pit Waste

The grease pit waste is generated primarily from used grease drums before they are shipped to an offsite drum cooperage facility. The residual grease in used drums is removed and stored in the grease pit. The spent floor scrubber solution, used for housecleaning at the plant, is also stored in the grease pit. These two wastes together, constitute the grease pit waste.



**SMITH-EMERY COMPANY** *An Independent Commercial Testing Laboratory Established 1904*  
 781 EAST WASHINGTON BOULEVARD • LOS ANGELES, CALIFORNIA 90021 • (213) 749-3411

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FILE NO: 7159  
 LABORATORY NO: 590410

DATE: MAY 7, 1984

FOR: PENNZOIL PRODUCTS COMPANY  
 1630 WEST OLYMPIC BOULEVARD  
 LOS ANGELES, CALIFORNIA 90015

ATTENTION: JAMES WALDRIP

SUBJECT: WASTE OIL ANALYSIS - P.O.# 43240-CE

SAMPLE: LIQUID WASTE FROM CLARIFIER AND GREASE PIT AT  
 3430 EAST 26TH STREET, VERNON, CALIFORNIA

PROCEDURE: STANDARD METHODS - A.P.H.A.

RESULTS:	A4464 <u>CLARIFIER</u>	A4465 <u>GREASE PIT</u>
FLASH POINT, ASTM D-93, °F.	>200	166
PH (50% SLURRY WITH WATER), UNITS	9.4	6.7
ARSENIC, PPM	0.16	0.13
CADMIUM, PPM	0.74	0.69
CHROMIUM, PPM	5.7	11.7
LEAD, PPM	4.7	17.7
MERCURY, PPM	<0.39	<0.36
NICKEL, PPM	2.3	2.3
SELENIUM, PPM	<0.19	<0.18
THALLIUM, PPM	<1.9	<1.8
CYANIDE, PPM	<0.1	<0.1
SULFIDE, PPM	N.D.	N.D.

CHLORINATED HYDROCARBONS, PPM

1,2-DICHLOROETHANE	26.0	5.6
TRICHLORDETHENE,	0.086	6.6

N.D. = NOT DETERMINED

RESPECTFULLY SUBMITTED,  
 SMITH-EMERY COMPANY

  
 P. E. MATHENY, MANAGER  
 CHEMICAL LABORATORY

PQS2 02115



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FILE NO: 7159  
 LABORATORY NO: S90560

DATE: JUNE 7, 1984

FOR: PENNZOIL PRODUCTS COMPANY  
 1630 WEST OLYMPIC BOULEVARD  
 LOS ANGELES, CALIFORNIA 90015

ATTENTION: JAMES WALDRIP

SUBJECT: LIQUID WASTE ANALYSIS - P.O.# 43283-C.E.


SAMPLE: ONE QUART SAMPLE FROM CLARIFIER, ONE QUART SAMPLE  
 FROM GREASE PIT RECEIVED 5/31/84

PROCEDURE: STANDARD METHODS, 15TH EDITION, A.P.H.A.

RESULTS:

	<u>CLARIFIER</u>	<u>GREASE PIT</u>
CADMIUM, PPM	<0.26	0.98
CHROMIUM, PPM	7.12	7.81
LEAD, PPM	9.87	7.92
NICKEL, PPM	0.39	2.46
 <u>CHLORINATED HYDROCARBONS, (C1 - C6), PPM</u>		
METHYLENE CHLORIDE	32.	<0.01
CHLOROFORM	0.29	0.21
1,1,1-TRICHLOROETHANE	<0.01	2.4
TRICHLOROETHYLENE	<0.01	19.
TETRACHLOROETHYLENE	<0.01	0.13

RESPECTFULLY SUBMITTED,  
 SMITH-EMERY COMPANY

  
 P. E. MATHENY, MANAGER  
 CHEMICAL LABORATORY

PQS2 02116